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December 19, 2023

**VIA ECF**

Hon. Victor Marrero  
United States District Judge  
United States Courthouse  
500 Pearl Street  
Suite 1610  
New York, NY 10007

**Request GRANTED.** Plaintiffs are hereby permitted to file the Consolidated Complaint attached as Exhibit A at Dkt. No. 20. Defendants shall have thirty (30) days from the entry of this Order to answer or otherwise respond to the Consolidated Complaint.

**SO ORDERED.**

20 December 2023

DATE

  
VICTOR MARRERO, U.S.D.J.

Re: *Avchukov, et al. v. EZ Festivals LLC, et al.*, 1:23-cv-08197-VM  
*Palie, et al. v. EZ Festivals LLC, et al.*, 1:23-cv-08422-VM  
*Ting, et al. v. Avant Gardner LLC, et al.*, 1:23-cv-09694-VM

Dear Judge Marrero,

We represent Plaintiffs in *Palie, et al. v. EZ Festivals LLC, et al.*, 1:23-cv-08422-VM, one of the four matters pending before Your Honor alleging claims based on the events occurring at the Electric Zoo Festival held over Labor Day Weekend this past September, which were previously consolidated by Your Honor. (See Order dated November, 8, 2023 ECF No. 22.)

In order to streamline the proceedings, we, along with counsel in the other two above-captioned matters (*Avchukov, et al. v. EZ Festivals LLC, et al.*, 1:23-cv-08197-VM *Ting, et al. v. Avant Gardner LLC, et al.*, 1:23-cv-09694-VM), respectfully seek permission to file a consolidated complaint (the "Consolidated Complaint") that will combine the above-referenced three cases. (A copy of the proposed Consolidated Complaint is attached hereto as Exhibit A.) Pursuant to Fed. R. Civ. P. 15(a)(2), Plaintiffs have sought Defendants' consent to file the Consolidated Complaint, to which Defendants have consented. See Exhibit B (Defendants' executed consent). Further, Plaintiffs understand that Defendants will be filing a request seeking 30 days (from the date of filing) to move or answer the Consolidated Complaint. Plaintiffs consent to this request.

USDC SDNY  
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Respectfully,

  
Shelly L. Friedland